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15 NOVO NORDISK INC.

16 **UNITED STATES DISTRICT COURT**  
17 **SOUTHERN DISTRICT OF CALIFORNIA**

18 IN RE INCRETIN-BASED  
19 THERAPIES PRODUCTS  
20 LIABILITY LITIGATION

21 *This Document Relates to All Cases*

Case No. 3:13-MD-02452-AJB-MDD

**DEFENDANT NOVO NORDISK  
INC.'S NOTICE OF  
COMPREHENSIVE MOTION TO  
SEAL CERTAIN CONFIDENTIAL  
INFORMATION AND EXHIBITS IN  
CONNECTION WITH CROSS-  
MOTIONS FOR SUMMARY  
JUDGMENT ON PREEMPTION**

24 Judge: Hon. Anthony J. Battaglia  
25 Ctrm: 3B

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Defendant Novo Nordisk Inc. (“Novo  
3 Nordisk”) will and hereby does move for an Order to seal certain portions of  
4 Plaintiffs’ Memorandum in Support of Plaintiffs’ Motion for Summary Judgment  
5 on Preemption, Plaintiffs’ Opposition to Defendants’ Motion for Summary  
6 Judgment on Preemption (collectively, the “Memoranda”); certain Exhibits  
7 accompanying the Declaration of Michael K. Johnson in Support of Plaintiffs’  
8 Motion for Summary Judgment on Preemption (“Exhibits”), and the Declaration of  
9 Heidi Levine, Esq. in support of Novo Nordisk’s Motion to Seal (“Levine  
10 Declaration”).

11 As set forth in Novo Nordisk’s Memorandum of Points and Authorities in  
12 Support of its Motion to Seal and the Levine Declaration, certain portions of  
13 Plaintiffs’ Memoranda and Exhibits contain confidential information about Novo  
14 Nordisk’s proprietary research and data, internal regulatory and safety analyses,  
15 confidential communications with FDA, and business strategies. The Levine  
16 Declaration contains descriptions of these confidential documents and information.  
17 Disclosure of this information could cause significant competitive harm to Novo  
18 Nordisk, and therefore, portions of the Memoranda, the Exhibits, and the Levine  
19 Declaration should be sealed.

20 This motion is based upon this Notice of Motion and Motion, the  
21 accompanying Memorandum of Points and Authorities, the Levine Declaration, all  
22 pleadings and papers on file in this action, and any other such matters that the Court  
23 deems appropriate.

24 DLA PIPER LLP (US)

25 Dated: August 21, 2015

26 By: /s/ Christopher M. Young  
27 Raymond M. Williams  
28 Christopher M. Young  
Attorneys for Defendant Novo Nordisk  
Inc.